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January 14, 2013

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Bldg., 2nd Fl.
400 North Street
Harrisburg, PA 17105-3265

RE: Petition of Metropolitan Edison Company for Approval of its Act 129 Phase II
Energy Efficiency and Conservation Plan; Docket No. M-2012-2334387

Petition of Pennsylvania Electric Company for Approval of its Act 129 Phase II
Energy Efficiency and Conservation Plan; Docket No. M-2012-2334392

Petition of Pennsylvania Power Company for Approval of its Act 129 Phase II
Energy Efficiency and Conservation Plan; Docket No. M-2012-2334395

Petition of West Penn Power Company for Approval of its Act 129 Phase II
Energy Efficiency and Conservation Plan; Docket No. M-2012-2334398

Dear Secretary Chiavetta:

Enclosed for electronic filing are Comverge, Inc.'s Petition for Admission *Nunc Pro Tunc* in the above-referenced matters. Copies have been served in accordance with the attached Certificate of Service.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Jeffrey J. Norton".

Jeffrey J. Norton

JJN/jls
Enclosure

cc: Hon. Elizabeth Barnes (w/enc)
Certificate of Service (w/enc)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Date: January 14, 2013


Jeffrey J. Norton

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF METROPOLITAN EDISON :
COMPANY FOR APPROVAL OF ITS ACT : Docket No. M-2012-2334387
129 PHASE II ENERGY EFFICIENCY AND :
CONSERVATION PLAN :

PETITION OF PENNSYLVANIA ELECTRIC :
COMPANY FOR APPROVAL OF ITS ACT : Docket No. M-2012-2334392
129 PHASE II ENERGY EFFICIENCY AND :
CONSERVATION PLAN :

PETITION OF PENNSYLVANIA POWER :
COMPANY FOR APPROVAL OF ITS ACT : Docket No. M-2012-2334395
129 PHASE II ENERGY EFFICIENCY AND :
CONSERVATION PLAN :

PETITION OF WEST PENN POWER :
COMPANY FOR APPROVAL OF ITS ACT : Docket No. M-2012-2334398
129 PHASE II ENERGY EFFICIENCY AND :
CONSERVATION PLAN :

**COMVERGE, INC.'S PETITION FOR ADMISSION
NUNC PRO TUNC OF DIRECT TESTIMONY**

Pursuant to 52 Pa. Code § 1.2, Intervenor Comverge, Inc. (“Comverge”) respectfully requests that Administrative Law Judge (“ALJ”) Elizabeth H. Barnes admit *nunc pro tunc* Comverge’s direct testimony into the record for proceedings related to the Act 129 Phase II Energy Efficiency and Conservation Plans (“Phase II Plans”) filed by FirstEnergy Corp. (“First Energy”) on behalf of Metropolitan Edison Company (“Met Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”), and West Penn Power Company (“West Penn”) (collectively, “the First Energy Companies”), and in support thereof, states as follows:

1. The Prehearing Conference Order, issued on November 29, 2012, scheduled January 8, 2013, as the deadline for the filing direct testimony to the First Energy Companies' Phase II Plans.

2. Comverge sought intervention in this proceeding on December 19, 2012.

3. On December 21, 2012, Comverge timely submitted comments to the First Energy Companies' Phase II Plans.

4. No party of record to this proceeding objected to Comverge's comments.

5. In addition to the present matter, Comverge also has intervenor status in the matters of *Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2334388; *Petition of Duquesne Light Company for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2334399; and *Petition of PECO Energy Company for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2333992, all presently before ALJ Dennis J. Buckley.

6. Judge Buckley recently issued orders in the PECO (Fifth Prehearing Order, dated January 2, 2013), PPL (Fourth Prehearing Order, dated January 9, 2013), and Duquesne (Fourth Prehearing Order, dated January 9, 2013) proceedings indicating that he "will only consider including 'comments' in the certified record if they are introduced at hearing by a party to the proceeding and an authenticating witness is made available for cross-examination." Each of these orders was issued beyond the filing deadline in the respective proceedings.

7. Comverge converted its comments into direct testimony, and now seeks to admit its direct testimony *nunc pro tunc*, since it is four business days beyond the scheduled date. A true and correct copy of Comverge's direct testimony is attached hereto as Exhibit A.

8. 52 Pa. Code § 1.2(a) permits the Commission or Presiding Officer to “disregard an error or defect of procedure which does not affect the substantive rights of the parties.”

9. 52 Pa. Code § 1.2(c) further permits the Commission or Presiding Officer to “waive a requirement of this subpart when necessary or appropriate, if the waiver does not adversely affect a substantive right of a party.”

10. In light of the accelerated schedule and compressed time period in this proceeding, Comverge’s late intervention into this proceeding, Comverge’s timely filing of its comments to the First Energy Companies’ Phase II Plans, and the fact that Comverge has only recently learned that there may be an issue with admitting its comments into the record, Comverge respectfully submits that admission *nunc pro tunc* of its direct testimony to the First Energy Companies’ Phase II Plans is warranted under the facts and circumstances present here.

11. Comverge’s proposed direct testimony does not materially differ in substance from its comments to the First Energy Companies’ Phase II Plans, which were timely filed and received by the other parties to this proceeding. No parties objected to the comments.

12. Comverge is willing to agree to whatever extension of time is reasonable and necessary to allow the other parties to object to, cross examine and/or rebut Comverge’s direct testimony.¹

13. Accordingly, the admission of Comverge’s direct testimony will not prejudice the other parties to this proceeding.

¹ Counsel for the First Energy Companies indicated by email to Comverge counsel that First Energy would likely oppose the present Petition on the grounds that the accelerated schedule and compressed time period would make it difficult to respond to Comverge’s direct testimony. Comverge will have no objection to allowing a reasonable extension of time for opposing parties to file objections and/or submit rebuttal testimony to Comverge’s direct testimony.

14. Comverge is simply offering credible suggestions and options to the Commission to consider the CHP option to improve the distribution companies' energy efficiency, conservation and cost reductions.

15. The record has not been officially closed at this time.

16. It is in the public interest that the record to this proceeding be complete in that it will aid this ALJ and the Commission in reaching a reasoned decision. Admitting Comverge's direct testimony *nunc pro tunc* will ensure that the record is complete.

WHEREFORE, for all the foregoing reasons, Comverge respectfully requests that its Petition for Admission *Nunc Pro Tunc* of Direct Testimony be granted and that the direct testimony attached hereto as Exhibit A be received into the record.

Respectfully submitted,



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Date: January 14, 2013

Attorneys for Comverge, Inc.

EXHIBIT A

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF METROPOLITAN EDISON :
COMPANY FOR APPROVAL OF ITS ACT : Docket No. M-2012-2334387
129 PHASE II ENERGY EFFICIENCY AND :
CONSERVATION PLAN :

PETITION OF PENNSYLVANIA :
ELECTRIC COMPANY FOR APPROVAL : Docket No. M-2012-2334392
OF ITS ACT 129 PHASE II ENERGY :
EFFICIENCY AND CONSERVATION :
PLAN :

PETITION OF PENNSYLVANIA POWER :
COMPANY FOR APPROVAL OF ITS ACT : Docket No. M-2012-2334395
129 PHASE II ENERGY EFFICIENCY AND :
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COMPANY FOR APPROVAL OF ITS ACT : Docket No. M-2012-2334398
129 PHASE II ENERGY EFFICIENCY AND :
CONSERVATION PLAN :

**DIRECT TESTIMONY
OF
RAYMOND G. BERKEBILE**

On Behalf of
Comverge, Inc.

January 14, 2013

1 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND BUSINESS**
2 **RESPONSIBILITIES.**

3 A. My name is Raymond G. Berkebile. I am the Director of Professional Engineering for
4 Comverge, Inc. (“Comverge”). My business address is 511 Schoolhouse Road, Suite
5 200, Kennett Square, PA 19348. In my current position, I lead an engineering team that
6 identifies opportunities for customers involving demand response, energy efficiency, and
7 energy management. I have been an engineer for over 27 years and have over 14 years of
8 experience in the power industry.

9 **Q. HAVE YOU EVER TESTIFIED BEFORE THIS COMMISSION?**

10 A. Yes. I recently offered direct written testimony in the matter of *Petition of PECO Energy*
11 *Company for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*,
12 Docket No. M-2012-2333992. In addition, I am contemporaneously offering direct
13 written testimony in the matters of *Petition of PPL Electric Utilities Corporation for*
14 *Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No.
15 M-2012-2334388, and *Petition of Duquesne Light Company for Approval of its Act 129*
16 *Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2334399.

17 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

18 A. I am testifying on behalf of Comverge.

19 **Q. PLEASE DESCRIBE COMVERGE.**

20 A. Comverge is one of the nation’s leading providers of energy management products and
21 services. Comverge has been an active Conservation Service Provider (“CSP”) in
22 Pennsylvania¹ and has served several electric distribution companies (“EDCs”) who are

¹ Comverge is registered as a CSP on the PUC’s Registry of CSPs, *available at*
[http://www.puc.pa.gov/utility_industry/electricity/conservation_service_providers_registr](http://www.puc.pa.gov/utility_industry/electricity/conservation_service_providers_registry.aspx)
[y.aspx](http://www.puc.pa.gov/utility_industry/electricity/conservation_service_providers_registry.aspx). *See also* Petition of Comverge, Inc., Docket No. A-2009-2113604, Secretarial

1 in the Act 129 Phase II Programs. Comverge has provided complex energy management
2 programs and related services to small business, large commercial, and industrial
3 customers throughout Pennsylvania, including those customers in the service territories
4 of Metropolitan Edison Company (“Met Ed”), Pennsylvania Electric Company
5 (“Penelec”), Pennsylvania Power Company (“Penn Power”), and West Penn Power
6 Company (“West Penn”).

7 Comverge has a unique business model, and extensive experience in providing
8 energy management solution services to all types of customers. With more than 500
9 utility and 2,100 commercial and industrial customers, five million deployed residential
10 devices, and over 10,000 metering points, Comverge has unparalleled industry
11 knowledge and experience to offering reliable, easy-to-use, and cost-effective intelligent
12 energy management solutions.

13 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

14 A. My testimony will address the Act 129 Phase II Energy Efficiency and Conservation
15 (“EE&C”) Plans (“Phase II Plans” or “Plans”) of FirstEnergy Corp. (“First Energy”) on
16 behalf of Met Ed (Docket No. M-2012-2334387),² Penelec, (Docket No. M-2012-
17 2334392),³ Penn Power (Docket No. M-2012-2334395),⁴ and West Penn (Docket No. M-

Letter dated Nov. 3, 2011 (approving application to re-register as a CSP). Comverge’s wholly owned subsidiary, Enerwise Global Technologies, is also registered as a CSP. See Petition of Enerwise Global Technologies, Inc., Docket No. A-2012-2297625, Secretarial Letter dated April 11, 2012 (approving the company’s application to register as a CSP).

² Available at http://www.puc.state.pa.us/about_puc/consolidated_case_view.aspx?Docket=M-2012-2334387.

³ Available at http://www.puc.state.pa.us/about_puc/consolidated_case_view.aspx?Docket=M-2012-2334392.

1 2012-2334398)⁵ (collectively, “the First Energy Companies”), which were filed with the
2 Pennsylvania Public Utility Commission (“PUC” or “Commission”) pursuant to Act 129
3 of 2008, 66 Pa . C.S. § 2806.1 (“Act 129) and the PUC’s Implementation Order entered
4 on August 3, 2012, at Docket Nos. M-2008-2069887 and M-2012-2289411.

5 **Q. PLEASE SUMMARIZE COMVERGE’S POSITION ON THE FIRST ENERGY**
6 **COMPANIES’ PHASE II PLANS.**

7 A. In these related proceedings, Comverge promotes the development of behind-the-meter
8 cogeneration with combined heat and power (“CHP”) technologies as a supported
9 energy-efficient and conservation measure to provide stability in reliability planning,
10 capture significant benefits, and avoid waste at little added cost. CHP technologies
11 generate electric and thermal energy from a single fuel source, e.g., natural gas.
12 Customers with steady base load electricity usage coupled with steady thermal demand
13 can realize significant efficiencies and savings by incorporating CHP. Comverge
14 supports the use of CHP as a cost-effective, energy-efficient energy use that supports the
15 goals and objectives of Act 129. Comverge believes CHP should have an important role
16 in the First Energy Companies’ Phase II Plans.

17 **Q. DO THE FIRST ENERGY COMPANIES DISCUSS CHP IN THEIR EE&C**
18 **PLANS?**

19 A. Yes. The First Energy Companies have included CHP as an energy efficiency and
20 conservation measure in their Phase I and Phase II EE&C Plans. In West Penn Power
21 Company’s Energy Efficiency and Conservation Plan (“West Penn Phase I Plan”),
22 Docket No. M-2009-2093218, West Penn mentioned CHP in its Custom Technology

⁴ Available at http://www.puc.state.pa.us/about_puc/consolidated_case_view.aspx?Docket=M-2012-2334395.

⁵ Available at http://www.puc.state.pa.us/about_puc/consolidated_case_view.aspx?Docket=M-2012-2334398.

1 Application Program. This program has been focused on reducing energy and demand
 2 for various customer segments, as well as improving energy efficiency for specific
 3 processes and applications, including CHP systems.⁶

4 In its Phase II Plan, Met Ed mentions CHP as a custom measure within the C&I
 5 Energy Efficient Equipment Program, along with other custom measures. Met Ed's
 6 Phase II Plan provides that calculated or performance based incentives will be provided
 7 to customers based upon an analysis of potential energy savings on a case by case basis
 8 for upgrading less efficient specialized processes and applications.⁷

9 **Q. DO THE FIRST ENERGY COMPANIES' PHASE II PLANS EFFECTIVELY**
 10 **UTILIZE CHP AS AN ENERGY EFFICIENCY AND CONSERVATION**
 11 **MEASURE?**

12 A. No. To the extent that they even discuss CHP, Comverge believes that the First Energy
 13 Companies' Phase II Plans do not go far enough regarding CHP.

14 **Q. WHAT IS YOUR RECOMMENDATION FOR THE DEVELOPMENT OF CHP**
 15 **TECHNOLOGIES IN THE SERVICE TERRITORIES OF THE FIRST ENERGY**
 16 **COMPANIES?**

17 A. Comverge believes CHP should have an important role in the First Energy Companies'
 18 Phase II Plans, and advocates that the First Energy Companies should adopt the elements
 19 of the Smart On-Site Program ("the Program") set forth in PECO's Phase II Plan that

⁶ CHP is repeatedly mentioned in the various incarnations of West Penn's Phase I Plan. See June 30, 2009 West Penn Phase I Plan at 19, 123, 133, 159-160, 172; December 21, 2009 West Penn Phase I Plan at 18, 116-117, 136-137, 147; April 29, 2010 West Penn Phase I Plan at 20, 117-118, 137-138 155; September 10, 2010 West Penn Phase I Plan at 92-93, 103-104, 123. See also West Penn's 2009 Third Quarter Report to the Commission at 54; West Penn's Annual Report dated September 15, 2010 at 90, 98, 110; West Penn's First Quarter Report of 2010 at 88, 96, 108; West Penn's Annual Report of June 2010-May 2011 at 79, 87; Met Ed's Quarterly Report of September 1, 2011 to November 30, 2011 at 74, 80; Met Ed's Quarterly Report of June 2011 to August 2011 at 71, 77. All available at http://www.puc.state.pa.us/about_puc/consolidated_case_view.aspx?Docket=M-2009-2093218.

⁷ Met Ed's Phase II Plan at 55, 123.

1 support CHP. The First Energy Companies should then actively develop and implement
2 CHP technologies in their respective service territories.

3 **Q. PLEASE BRIEFLY DESCRIBE PECO'S SMART ON-SITE PROGRAM.**

4 A. As an example, in PECO's Phase II Plan, the Smart On-Site Program sets forth the
5 PECO's interest in developing CHP technologies in its service territory.⁸ In its Petition
6 for Approval of its Phase II Plan, PECO states that the PECO Smart On-Site Program is
7 designed to encourage installation of CHP projects that "maximize operational savings
8 and minimize operational and maintenance costs. It offers incentives to customers who
9 install CHP technologies to reduce facility energy use."⁹

10 **Q. PLEASE DESCRIBE THE OBJECTIVES OF PECO'S SMART ON-SITE**
11 **PROGRAM.**

12 A. PECO's Smart On-Site Program ("the Program") will be rolled out to the public during
13 PY 2013 and will operate through PY 2015. In its Phase II Plan, PECO sets forth its
14 Smart On-Site Program objectives:

- 15 1. Increase consumers' awareness and understanding of CHP
16 technologies and opportunities in their facilities.
- 17 2. Assist customers interested in acting on opportunities to install
18 various types of CHP systems.

⁸ See PECO's Phase II Plan at 147-154; see also PECO St. No. 1 (Jiruska) at 16; PECO St. No. 2 (Galvin) at 12; Exhibit RAS-2, Phase II Plan Program Cost By Rate Class (PY2013-PY2015). All available at http://www.puc.state.pa.us/about_puc/consolidated_case_view.aspx?Docket=M-2012-2333992.

⁹ Petition of PECO Energy Company for Approval of its Phase II Energy Efficiency and Conservation Plan, Docket No. M-2012-2333992, at 10, available at http://www.puc.state.pa.us/about_puc/consolidated_case_view.aspx?Docket=M-2012-2333992.

- 1 3. Overcome financial barriers to allow customers to integrate CHP
- 2 technologies into their facilities energy systems.
- 3 4. Make a significant contribution to attainment of PECO's energy
- 4 savings goals.
- 5 5. Demonstrate PECO's commitment to and confidence in innovative
- 6 energy savings technologies.
- 7 6. Strengthen customer trust in PECO as their partner in saving
- 8 energy.¹⁰

9 **Q. PLEASE DESCRIBE PECO'S PLAN TO DEVELOP CHP TECHNOLOGIES.**

10 A. PECO's target customer market for its Smart On-Site Program includes all existing
11 commercial and industrial accounts, including government, public, and non-profit
12 facilities. The Company's focus for the Program is customers installing any type of CHP
13 technology that helps offset facility demand. The Program offers incentives to customers
14 who install CHP technologies to reduce facility energy use.¹¹ CHP technologies generate
15 electric and thermal energy from a single fuel source, e.g., natural gas. Customers with
16 steady base load electricity usage coupled with steady thermal demand can realize
17 significant efficiencies and savings by incorporating CHP. The Program will be designed
18 to ensure participating customers install economic CHP projects that maximize
19 operational savings and minimize operational and maintenance costs.¹² The Program
20 incentives are paid on a declining tiered incentive rate by installed capacity with a bonus

¹⁰ PECO's Phase II Plan at 147.

¹¹ *Id.*

¹² *Id.*

1 performance payment. The performance payment is paid on a fixed per kWh basis based
2 on actual energy savings after a one-year monitoring period.¹³

3 **Q. IS ASSISTANCE AVAILABLE TO ENERGY USERS?**

4 A. Yes. In its Program, PECO points out that several other sources of technical and
5 financial assistance are available to commercial and industrial energy users to enable
6 energy efficiency improvements. PECO highlights specifically the United States Clean
7 Heat and Power Association as an applicable collaborative resource to entities that utilize
8 CHP and who work to develop sound clean energy policy and market place solutions.¹⁴

9 **Q. DOES PECO'S SMART ON-SITE PROGRAM PROVIDE INCENTIVES TO**
10 **ENERGY USERS?**

11 A. Yes. PECO's Phase II Plan also sets forth measures that demonstrate the Programs
12 proposed per-unit gross annual deemed savings, costs and potential incentives.¹⁵ The
13 Program will record energy savings and peak load reductions from the incentive
14 applications processed. The Program encourages installation of CHP projects that
15 maximize operational savings and minimize operational and maintenance costs. It offers
16 incentives to customers who install CHP technologies to reduce facility energy use.

17 The Program offers custom incentives paid on a fixed per kWh basis (up to a set
18 amount) based on the projects' first year energy savings. PECO projects that the
19 Program will produce 135,002 MWh in energy savings over the course of the Plan. The
20 budget for the program is approximately \$14.9 million.¹⁶

13 *Id.*

14 *Id.* at 149.

15 *Id.* at 151.

16 PECO St. No. 1 (Jiruska) at 16.

1 **Q. IS COMVERGE WILLING TO PARTICIPATE IN THE DEVELOPMENT OF**
2 **CHP IN THE SERVICE TERRITORIES OF THE FIRST ENERGY**
3 **COMPANIES?**

4 A. Yes. Comverge's unique offering of a CHP cogeneration operation strategy can assist the
5 First Energy Companies in meeting their Act 129 goals and objectives. Comverge can
6 help the First Energy Companies and the regulators integrate the three programs of load
7 management, energy efficiency, and distributed generation into a cohesive model for
8 customers. Comverge can elucidate a business strategy through energy and load
9 optimization to fill this void. Comverge is working to actively pursue cogeneration as it
10 is truly a distributed generation and energy efficiency solution.

11 **Q. ARE THERE OTHER REASONS THAT SUPPORT THE DEVELOPMENT OF**
12 **CHP TECHNOLOGIES IN THE SERVICE TERRITORIES OF THE FIRST**
13 **ENERGY COMPANIES?**

14 A. Yes. The development of CHP technologies is in the public interest since CHP
15 technologies and opportunities will make a significant contribution to attainment of the
16 First Energy Companies' energy savings goals under Act 129 by providing innovative
17 ways to increase energy efficiency and conserve energy. The following points and
18 suggestions further support the development of CHP technologies in the service
19 territories of the First Energy Companies:

- 20 1. CHP systems have a higher degree of certainty in the hours of
21 operation, energy costs and savings over their lifetime. For
22 example, the CHP hours of operation can be continuous, thereby
23 allowing the estimated costs to be easier to define and manage.
24 Other referenced custom measures can be more impacted by
25 weather, occupancy levels, project load and non-energy benefits.

1 With CHP, any upfront capital investment can be recouped quicker
2 with the savings from the generation of on-site electricity.

3 2. Although CHP technologies can utilize a variety of fuels, most CHP
4 systems utilize natural gas. With the availability and abundance of
5 low-cost natural gas throughout the Marcellus Shale and Utica
6 Shale regions, the implementation of distributed generation with gas
7 makes financial, economic and environmental sense.¹⁷

8 3. CHP distributed on-site generation of electricity reduces
9 transmission and distribution losses, reduced grid congestion,
10 improves reliability, reduces base-load (presumably coal-fired)
11 generation requirements, reduces capacity requirements and
12 provides enhanced national security by becoming less dependent on
13 foreign oil. Since CHP is more efficient, less fuel is required to
14 produce a given energy output than with separate heat and power.
15 Higher efficiency translates into: lower operating costs, reduced
16 emissions of all pollutants, increased reliability and power quality,
17 reduced grid congestion and avoided distribution losses.¹⁸

¹⁷ See Anna Chittum and Nate Kaufman, *Challenges Facing Combined Heat and Power Today: A State-by-State Assessment*, American Council for an Energy-Efficient Economy, Report Number IE111, September 2011, at 21, 63, available at <http://www.uschpa.org/files/public/ie111.pdf>.

¹⁸ For more information regarding the benefits of CHP technologies and the differentiation between generation efficiency and on-site efficiency, see <http://www.epa.gov/chp/basic/efficiency.html>.

1 4. To mitigate the risks of variable energy costs associated with the
2 implementation of CHP, the contractual parties can enter into long-
3 term power purchase agreements to lock in the costs.

4 5. The First Energy Companies should fully consider the societal
5 impacts and benefits of reducing the carbon footprint through
6 implementation of CHP projects, which help minimize externalities
7 such as NOx (nitrous oxide), SOx (sulfur oxide), and VOC (volatile
8 organic compound) emissions.¹⁹

9 6. The First Energy Companies should further consider the numerous
10 non-energy-related benefits of implementing CHP projects,
11 including comfort, health and safety, aesthetics, financial savings,
12 water savings, sustainable job creation and economic
13 development.²⁰

14 **Q. DOES THIS COMPLETE YOUR TESTIMONY?**

15 A. Yes.

¹⁹ See Robin LeBaron, *Getting to Fair Cost-Effectiveness Testing Using the PAC Test, Best Practices for the TRC Test, and Beyond*, National Home Performance Council, September 19th, 2011, at 8-9, available at <http://www.nhpci.org/images/TRC.pdf>.

²⁰ See *Id.* at 8-10.

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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129 PHASE II ENERGY EFFICIENCY AND :
CONSERVATION PLAN :

VERIFIED STATEMENT OF RAYMOND G. BERKEBILE

Raymond G. Berkebile, being duly sworn, states as follows:

1. I, Raymond G. Berkebile, am the Director of Professional Engineering for Comverge, Inc. (“Comverge”) and am authorized to make the statements contained herein.

2. On behalf of Comverge, I have submitted Direct Testimony (marked as Comverge St. 1, containing ten (10) pages) in this proceeding.

3. This testimony was prepared by me or under my supervision or direction for purposes of this proceeding on behalf of Comverge.

4. I have no additional changes to Comverge St. 1 and certify that the testimony I have submitted is true and correct to the best of my information, knowledge and belief. If I were asked the same questions set forth in my testimony today, my answers would be the same.

5. I hereby state that the facts and representations set forth above are true and correct to the best of my knowledge, information and belief. I understand that the statements made herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsifications to authorities).


Raymond G. Berkebile